

SECTION 1.10 HISTORIC PRESERVATION REVIEW

A. Policy

Under our current federal programs, contractors need to follow the National Historic Preservation Act of 1966 guidelines, which are administered by the Office of Archaeology and Historic Preservation (OAHP), part of the Office of Community Development. OAHP has developed the following policy for weatherization programs. This policy will apply to all federal programs, including DOE, HHS, BPA weatherization, RRP, and HOME.

BACKGROUND

Section 106 of the National Historic Preservation Act requires federal agencies, often through local pass-through agencies, to seek comment on federally funded undertakings when National Register listed or eligible properties are involved. If listed or eligible for listing on the National Register, adequate information (in the form of a detailed project description - sometimes including plans and/or specs) must be submitted to OAHP. OAHP comments are in the form of a determination of effect (No Historic Properties Effected, No Adverse Effect or Adverse Effect). To achieve a No Adverse Effect finding, project work must meet the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

B. Procedure

Step 1. Determine whether a property is listed on or is eligible for listing on the National Register of Historic Places. To determine if a property is listed on the National Register, you can search the National Register listing on OAHP's website: <http://www.oahp.wa.gov>. If the property is listed on the National Register proceed to Step 5. If the property is not listed on the National Register proceed to Step 2.

Step 2. Determine the age of the property by consulting with the owner, the tax assessor, or the local building department.

- a) If the property is less than 45 years old, note that the building is in the file and the review procedure in regards the National Historic Preservation Act is finished.

- b) If the property is more than 45 years old, you must complete Steps 2 and 3 of the process.

Step 3. Complete an “Attachment A” form with the required information and mail it to Office of Archaeology and Historic Preservation. You will need an address, a photo of the building and an approximate built date.

Step 4. OAHP will determine, within thirty days, if the property is listed on or is eligible for listing on the National Register of Historic Places and if further historic review is deemed necessary.

- a) If the property is not eligible for the National Register of Historic Places, the review procedure is finished and OAHP will notify you.
- b) If the property is eligible for, or is currently listed on the National Register of Historic Places, OAHP will notify you and an Attachment “B” must then be submitted to OAHP which describes the proposed work to be completed on the structure.

Step 5. Using the Attachment “B” form filled out by the applicant/ agency, OAHP will determine the effect of the proposed work to the structure. A determination of: “No Historic Properties Affected, No Adverse Effect or Adverse Effect” will be issued regarding the proposed work based on the Attachment “B” documentation.

- a) If the proposed work will not have a direct impact on the historic resource, a determination of No Historic Properties Affected will be found. OAHP will notify you and the project can proceed then as planned.
- b) If the proposed work will have a minimal impact on the historic resource and will protect the historic qualities of the structure, a determination of No Adverse Effect will be found. OAHP will notify you and the project can proceed then as planned.
- c) If the proposed work will have an impact on the historic resource and will diminish or alter the historic qualities of the structure, a determination of Adverse Effect will be found. The project work plan will then need to be adjusted after further consultation with OAHP in order to

follow the *Secretary of the Interior Standards for the Treatment of Historic Properties*.

- d) If an Adverse Effect can not be resolved and federal funding is not withdrawn from the project, measures to mitigate the Adverse Effect must be developed in further consultation with OAHP.

Suggestions to expedite review:

- Submit your Attachment A form (determination of eligibility for the National Register) as early as possible. Expect that it will take at least three to four weeks for the Historic Preservation Office to review the form.
- Be sure to provide all information requested on the Attachment A form, including identification of the primary federal fund source that you expect to charge your work. You only need to indicate one primary funding source, even if you are combining funds.
- Provide as good a photo as possible.
- Submit your Attachment A form and digital photo electronically.
- Provide actual street address, not a post office box, to identify the location of the property.

You should always consider the visual impacts of your work on all properties, regardless of their historic value. Certain measures will usually result in an Adverse Effect on the appearance of any building and will require consultation with OAHP. These might include:

- Plugs installed in exterior siding for blown-in wall insulation.
- Window and door replacements of existing original components.
- Roof material replacement other than in-kind. A high quality composition (3-tab asphalt) roof may be acceptable.
- The raising of the roof or addition of visible roof jacks.
- Other treatments that alter the visual character of the resource.

Attached is NPS Preservation Brief 3 (Conserving Energy in Historic Buildings) which includes an excellent discussion on energy conservation for historic buildings with specific recommendations for positive results in the weatherization of structures. Please share this material with your staff, crews, and subcontractors.

Also attached is a portion of the *Secretary of the Interior's Standards for Rehabilitation* which covers window treatments. These are the guidelines that OAHP will follow.

WEATHERIZATION RECOMMENDATIONS

for National Register eligible and listed properties

Section 106 of the National Historic Preservation Act requires federal agencies, often through local pass-through agencies, to seek Office of Archaeology and Historic Preservation (OAHP) comment on federally funded undertakings when National Register listed or eligible properties are involved. Adequate information (in the form of a detailed project description - sometimes including plans and/or specs) must be submitted to OAHP. OAHP comments are in the form of a determination of effect (no historic properties affected, no adverse effect or adverse effect). To achieve a no adverse effect finding, project work must meet the Secretary of the Interior's Standards for the Treatment of Historic Properties. Information regarding the standards can be found at: <http://www2.cr.nps.gov/tps/tax/rhb>.

The following are some basic do's and don'ts relating to the Secretary of the Interior Standards when dealing with home or small building repair and weatherization:

ROOF

- Do: Re-roof with materials that match or are compatible with the original roofing materials.
- Do: Insulate attic spaces, adding appropriate venting, but avoid introducing rooftop vents, particularly on street facing facades.

INSULATION

- Do: Retain historic wall cladding. Avoid replacement with vinyl or metal siding. Choose methods to upgrade energy efficiency that do not damage significant historic building fabric. Fully caulk, weather-strip and add appropriate flashing.
- Don't: If blown-in insulation is proposed, it should not be installed through holes drilled (and later plugged) in exterior siding.
- Do: Consider alternatives such as installing insulation through interior walls, or lifting or removing and re-installing selected rows of siding (or individual shingles) allowing insulation to be blown in from the exterior.

WINDOWS / DOORS

- Do: Retain and repair existing historic windows whenever possible. Some historic windows can be retrofitted with double-glazing. If original windows can not be repaired, they should be replaced in-kind. More energy efficient windows are acceptable as long as materials, window configuration and dimensions match the originals.
- Don't: Replace windows with vinyl or metal units. In almost all situations replacement with these materials will not meet the Secretary's Standards. Clad windows are sometimes acceptable when windows are not viewed from nearby public rights-of-way.

FOUNDATION / FLOOR

- Do: Provide insulation in crawl spaces, providing adequate and appropriate venting.